

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X  
P.A., JR., an infant minor,

Plaintiff,

- against -

CITY OF NEW YORK; JOHN MATTINGLY,  
individually and in his capacity as Commissioner of the  
Administration for Children's Services; DEBORAH  
PRIDE, individually and in her capacity as a Child  
Protective Specialist for the Administration for Children's  
Services; NATALIA ROSADO,  
individually and in her capacity as a Child Protective  
Specialist for the Administration for Children's Services;  
ROSA SOSA, individually and in her capacity as a Child  
Protective Specialist for the Administration for Children's  
Services; ROBERT SALEMI, individually and in his  
Capacity as a Supervisor of Child Protective Specialists for  
the Administration for Children's Services; ST.  
VINCENT'S SERVICES, INC.; CARLINE ANDERSON,  
individually and in her capacity as a caseworker for St.  
Vincent's Services, Inc.; and ZOILA VILLALTA,  
individually and in her capacity as a supervisor of  
caseworkers for St. Vincent's Services, Inc.,

Defendants.  
----- X

10-CV-04661(JG)(SMG)

**Electronically Filed**

**NOTICE OF MOTION OF PLAINTIFF P.A., JR.  
TO COMPEL PRODUCTION AND RESPONSES TO THE  
INTERROGATORIES AND FOR AN ORDER DEFERRING DEPOSITIONS**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Jonathan J. Lerner, the exhibits annexed thereto and Plaintiff P.A., Jr.'s Memorandum of Law in Support of His Motion to Compel Production and Responses to the Interrogatories and for an Order Deferring Depositions, Plaintiff P.A., Jr. will move in the United States District Court for the Eastern District of New York, before the Honorable Steven M. Gold, U.S.M.J., at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and at a time

to be designated by the court, for an order pursuant to Rules 37(a) and 26(c) of the Federal Rules of Civil Procedure (1) compelling Defendant City of New York to produce all outstanding document discovery (including electronically stored information); (2) compelling Defendant City of New York to provide responses to Interrogatories 1-8 in P.A.'s Second Set of Interrogatories on Defendant City of New York; and (3) deferring depositions until after discovery is substantially complete.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's order dated April 18, 2012, any opposition to this motion must be filed by June 15, 2012 and any reply by June 22, 2012.

Dated: June 8, 2012  
New York, New York

Respectfully submitted,

SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP

/s/ Jonathan J. Lerner  
Jonathan J. Lerner ([jonathan.lerner@skadden.com](mailto:jonathan.lerner@skadden.com))  
Robert A. Fumerton([robert.fumerton@skadden.com](mailto:robert.fumerton@skadden.com))  
Patrick G. Rideout ([patrick.rideout@skadden.com](mailto:patrick.rideout@skadden.com))  
Four Times Square  
New York, New York 10036  
(212) 735-3000

*Attorneys for Plaintiff P.A., JR.*